

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
UNITED STATES OF AMERICA	)	
	)	
v.	)	CR. No. 03-10393-MLW
	)	
STEVEN VARGAS	)	
defendant	)	
_____	)	

*DEFENDANT'S ASSENTED-TO MOTION TO EXTEND DATE FOR FILING MOTIONS*

The defendant, Steven Vargas, moves to extend the time to file motions August 17, 2004 to August 31, 2004. The defendant notes that the initial status conference has been continued to September 8, 2004 from August 24, 2004, and counsel for the government has informed him that she will be involved in several evidentiary motions hearings in August and assents to this motion.

The defendant that the ends of justice served by allowing this motion outweigh his interest and the public's interest in a speedy trial, and this Court should therefore exclude any otherwise countable time due to this motion for extension of time from the requirements of the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*, pursuant to section 3161(h)(8)(A) and (B) of that Act. The defendants expressly waives any rights he has under the Speedy Trial Act as to the relevant period.

By his Attorney,

/s/ David Duncan  
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July 14, 2004

ASSENTED TO: Antoinette E. M. Leoney, (telephone assent)